

1 WEIL, GOTSHAL & MANGES LLP
2 Richard W. Slack (*pro hac vice*)
(richard.slack@weil.com)
3 Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
4 Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
5 767 Fifth Avenue
New York, NY 10153-0119
Tel: 212 310 8000
6 Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP
Jane Kim (#298192)
(jkim@kbkllp.com)
David A. Taylor (#247433)
(dtaylor@kbkllp.com)
Thomas B. Rupp (#278041)
(trupp@kbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

7 *Attorneys for Debtors and Reorganized Debtors*
8
9

10 **UNITED STATES BANKRUPTCY COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

13
14
15 **In re:**

16 **PG&E CORPORATION,**

17 **- and -**

18 **PACIFIC GAS AND ELECTRIC**
19 **COMPANY,**

20 **Debtors.**

21 Affects PG&E Corporation
22 Affects Pacific Gas and Electric Company
23 Affects both Debtors

24 * *All papers shall be filed in the Lead Case, No.*
25 *19-30088 (DM).*

26 Bankruptcy Case No. 19-30088 (DM)

27 Chapter 11

28 (Lead Case) (Jointly Administered)

**DECLARATION OF EDWARD J.
RADETICH, JR. IN SUPPORT OF
REORGANIZED DEBTORS' FOURTEENTH
SECURITIES CLAIMS OMNIBUS
OBJECTION (CLAIMS BARRED BY THE
STATUTE OF REPOSE)**

Response Deadline:
October 26, 2021, 4:00 p.m. (PT)

Hearing Information If Timely Response Made:

Date: November 9, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Edward J. Radetich, Jr., pursuant to section 1746 of title 28 of the United States Code, hereby
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,
3 information, and belief:

4 1. I am a Managing Director of Kroll Settlement Administration LLC (“**KSA**”), an affiliate
5 of Prime Clerk LLC (“**Prime Clerk**”). KSA’s main office is located in Philadelphia, Pennsylvania.

6 2. I am providing this Declaration in support of the *Reorganized Debtors’ Fourteenth
7 Securities Claims Omnibus Objection (Claims Barred by the Statute of Repose)* (the “**Omnibus
8 Objection**”),¹ filed contemporaneously herewith in the chapter 11 cases (the “**Chapter 11 Cases**”) of
9 PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors
10 (collectively, “**PG&E**,” the “**Debtors**,” or the “**Reorganized Debtors**,” as applicable).

11 3. I have extensive experience and expertise in all aspects of claims administration,
12 including direct notice, paper and electronic publication, nominee outreach, website design, claimant
13 communication, claims intake and processing, distribution of payments, and tax reporting. Notably, I
14 personally oversaw the very first securities class action, the Atlantic Department Stores class action
15 lawsuit in 1975. Since then, our team has administered more than 3,000 matters involving securities
16 fraud, antitrust, consumer, employment and labor, and government enforcement actions. Our team has
17 handled all aspects of claims administration in many noteworthy securities class action settlements in
18 recent years, including *In re Bank of America Corporation Securities Litigation*, No. 11-cv-00733-WHP
19 (S.D.N.Y); *In re Longwei Petroleum Investment Holding Limited Securities Litigation*, No. 13-cv-214
20 (RMB) (S.D.N.Y); and *In re The Bank of New York Mellon ADR FX Litigation*, No. 1:16-cv-00212
21 (S.D.N.Y). A detailed description of my experience and qualifications is attached as **Exhibit A**.

22 4. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon
23 my personal knowledge, the knowledge of other employees working under and alongside me on this
24 matter, my discussions with the Reorganized Debtors’ personnel and the Reorganized Debtors’ various
25 advisors and counsel, and my review of relevant documents and information. If called upon to testify, I
26 would testify competently to the facts set forth in this Declaration. I am authorized to submit this
27 Declaration on behalf of the Reorganized Debtors.

28 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Omnibus
Objection.

1 || Identification of Claims Subject to the Omnibus Objection

2 5. KSA has been asked by the Reorganized Debtors and their counsel to assist with
3 reviewing and analyzing the claims based on the purchase or acquisition of PG&E securities filed in the
4 Chapter 11 Cases, including identifying claims to be included in the Omnibus Objection. In furtherance
5 thereof, our team has established and reviewed a database for these claims. The database contains
6 information extracted from proofs of claim or submitted by claimants via an online portal and/or other
7 means.

8 6. Based on our review, and information provided to us by Compass Lexecon, LLC
9 (“Compass”), we have identified claims that, based on all of the trading data submitted by the claimants,
10 are asserted exclusively on account of transactions in PG&E debt securities where the offering occurred
11 more than three years before the filing of the Chapter 11 Cases.

12 7. These identified claims are set forth on Exhibit 1 to the Omnibus Objection, which was
13 prepared by our team under my general supervision, and I am familiar with its contents and the process
14 under which it was prepared.

15 8. None of the claims allege transactions in any PG&E debt security issued less than three
16 years before the filing of the Chapter 11 Cases.

[REMAINDER OF PAGE LEFT BLANK INTENTIONALLY]

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
2 correct to the best of my knowledge, information, and belief.

3

4 Executed September 28, 2021 in New Jersey.

5 */s/ Edward J. Radetich, Jr.*
6 Edward J. Radetich, Jr.
7 Managing Director

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28